

NICHOLAS A. TRUTANICH
United States Attorney
Nevada Bar No. 13644

CAROLYN B. CHEN, C.S.B.N. 256628
Special Assistant United States Attorney
160 Spear Street, Suite 800
San Francisco, CA 94105
Telephone: (415) 977-8956
Facsimile: (415) 744-0134
Carolyn.Chen@ssa.gov

Attorneys for Defendant

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

DAVID REVELES,

Plaintiff,

v.

NANCY A. BERRYHILL,
Acting Commissioner of Social Security,

Defendant.

Case No. 2:19-cv-00100-RFB-VCF

**STIPULATION AND ORDER FOR
EXTENSION OF TIME FOR
DEFENDANT TO FILE OPPOSITION TO
PLAINTIFF'S MOTION FOR REMAND**

IT IS HEREBY STIPULATED, by and between the parties, through their respective counsel of record, that Defendant shall have an extension of time of 45 days to file her opposition to Plaintiff's motion for remand, from May 24, 2019, to July 8, 2019.

This is the first continuance in this case and the first continuance sought by Defendant. There is good cause for this request. Since the filing of Plaintiff's motion for remand, Defendant's counsel has been addressing a full workload and backlog of district court cases and other matters. Starting April 24, 2019, Defendant's counsel has had at least 17 district court and bankruptcy court matters. Defendant's counsel has shifted and is continuing to shift many of her cases to avoid missing the deadlines of her

1 cases and minimize further delay of her older cases to which she is giving priority where possible. In
2 addition, many of Defendant's counsel's cases required her to take additional time to complete.
3 Defendant's counsel also has at least 23 other scheduled matters in the next month and a half, along with
4 pre-approved leave in May.

5 Because of the factors described above, Defendant is requesting additional time up to and
6 including July 8, 2019, to fully review the administrative record and research the issues presented by
7 Plaintiff's motion for remand. This request is made in good faith with no intention to unduly delay the
8 proceedings.

9 Therefore, with this Court's approval, the Court's scheduling order shall be extended by 45 days,
10 so that Defendant may file her opposition to Plaintiff's motion for remand on or before July 8, 2019.

11
12 Respectfully submitted,

13 Dated: May 15, 2019

LAW OFFICES OF LAWRENCE D. ROHLFING

14 /s/ Cyrus Safa

(as authorized via e-mail on 5/15/2019)

15 CYRUS SAFA

16 Attorneys for Plaintiff

17 Dated: May 15, 2019

NICHOLAS A. TRUTANICH

18 United States Attorney

19 /s/ Carolyn B. Chen

CAROLYN B. CHEN

20 Special Assistant United States Attorney

21 **IT IS SO ORDERED.**

22 

23
24 ORDER

UNITED STATES MAGISTRATE JUDGE

DATED: 5-17-2019

25 PURSUANT